

Weston Affordable Housing Trust

May 8, 2017

To: Weston Zoning Board of Appeals (ZBA)
stockman.n@westonmass.org

From: Weston Affordable Housing Trust (HT)

Re: 104 Boston Post Road – Stony Brook 40B Proposal

The Weston Affordable Housing Trust (HT) submits this letter to the ZBA to provide input and recommendations regarding the Comprehensive Permit application for the multi-family rental housing development being proposed at 104 Boston Post Road (“the project”). The HT submitted a letter of conditional support to the Board of Selectman on January 12, 2017. In that letter the HT raised some project concerns that are still relevant. The HT also notes the concerns raised by various Town boards, commissions and staff, including of note the Planning Board, Historic Commission, and Conservation Commission. We urge the ZBA to require the applicant to provide the requested additional information, and respond as necessary to recommendations of the Town’s peer review consultants, in order to address these important questions to the Town’s reasonable satisfaction. The HT has focused our comments and recommendations below to an analysis of issues and preferences that the Town has identified in the “Town of Weston Policies and Preferences for Affordable Housing” document which we believe are necessary for our approval of the project.

The HT urges the ZBA to stipulate the following conditions as part of the issuance of the Comprehensive Permit regarding the affordable housing component to the proposed project:

1. All of the units in the Project shall be eligible for inclusion in the SHI as set forth in Section II.A.2.b.1 of "Guidelines G.L. C.40B Comprehensive Permit Projects Subsidized Housing Inventory," MA Department of Housing and Community Development ("Guidelines") in perpetuity.
2. All affordable units, of each type (i.e. 1 br, 1br + den, 2br and 3 br), in the development shall be evenly disbursed throughout the project and be indistinguishable from market units in external appearance and interior finishes, fixtures, and appliances. Further, the average square footage of the affordable units shall be equal to the average square footage of the market units for each type of unit. Unless otherwise required by the Subsidizing Agency, the Affordable Units shall have the same unit “ratio” or “mix” as the other units in the Project. For example, there are 54 one-bedroom units in the Project or a ratio of 54:150 (9:25), 26 one-bedroom plus a den units or a ratio of 26:150 (13:75), 55 two-bedroom units or a ratio of 55:150 (11:30), and 15 three-bedroom units or a ratio of 15:150 (1:10). Final unit mix, unit location, and unit specifications (of interior finishes, fixtures, and appliances) shall be submitted by the applicant for approval by the Town, with review and recommendations by the Affordable Housing Trust, prior to the submission to the Subsidizing Agency for final approval.
3. In accordance with the Guidelines, and to the extent allowed by law, at initial lease-up preference for renting up to fifty percent (50%) of the Affordable Units shall be given to residents of the Town, which for this purpose is defined as anyone currently living in the Town (at the time of application to rent a unit), employees of the Town, businesses located in the Town, or holders of bona fide offers of employment with the same, or households with children attending school in the Weston School District.

4. Affirmative Marketing Plan, including the name and qualifications of both the lottery agent and ongoing property manager, shall be submitted by the applicant for approval by the Town, with review and recommendations by the Affordable Housing Trust prior to the submission to the Subsidizing Agency for final approval. The Town will work with the applicant to market the affordable units, specifically identifying appropriate local outreach venues.
5. The Owner shall submit to the Town annually all monitoring reports including annual rent increases and information verifying income eligibility for the affordable units.
6. All leases for the units in the Project shall include language stating that tenants may not use any rooms other than bedrooms for sleeping purposes. Living rooms, dens, or dining rooms for example, may not be used as bedrooms.

We recognize that many of the above 1-6 recommendations will likely be addressed by the Subsidizing Agency and the Massachusetts Department of Housing and Community Development (DHCD) as part of the "Guidelines G.L. C.40B Comprehensive Permit Projects Subsidized Housing Inventory"; however, it is incumbent upon the Town to state these requirements clearly in the Comprehensive Permit to ensure the project meets or exceeds these requirements as may be beneficial to the Town.

The HT encourages the ZBA to request the project proponent accommodate, to the greatest extent possible, the following specific preferences in order to make for a safer and more livable community:

1. Construct all units following Universal Design principals to allow units to be adaptable and able to convert to accessible as may be required by the occupant.
2. Design for walk-ability by providing sidewalks or informal pathways, or both. Ensure that the project contains pedestrian accessibility, including sidewalks on Boston Post Road to connect to future sidewalks. Consideration must also be made for school bus access.
3. Design for Sense of community. Consider building and site layouts that encourage communication and interaction among residents of the development (e.g. Common spaces within buildings, or common facilities, open space, or recreation areas.)
4. Design common open space so that it will be accessible to all residents of the development.
5. Protect historic resources by designing projects to avoid adverse impacts on structures with historic or architectural significance. The HT encourages the developer to continue to work with the Historical Commission to seek alternate sites for the Sibley House.
6. Employ "green" development practices, considering both building and site.
7. Address sustainability in the design, construction and operations/maintenance of the project.

Finally, the HT urges the applicant to work with subsidizing agency to provide additional affordable units that would qualify as workforce housing with rents affordable to individuals and families with incomes of 81% to 120% of the Area Median Income (AMI). These units may qualify for subsidies through the MassHousing Workforce Housing Initiative.

Respectfully submitted,

Trustees of the Weston Affordable Housing Trust